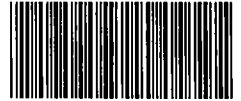


ORIGINAL



SDMS DocID

2228527

May 24, 1988

Mr. Lawrence Falkin  
United States Environmental Protection Agency  
CERCLA Removal Enforcement Section (3HW14)  
841 Chestnut Building  
Philadelphia, PA 19107

Dear Mr. Falkin:

Please refer to your recent undated letter concerning the CERCLA action EPA proposes to undertake at the Metro Container Site.

According to our records, Amtrak's only involvement with Metro Container was their removal of 230 completely empty, crushed 55-gallon drums from our Wilmington, DE shops. These drums had formerly held non-hazardous materials, and had been fully drained prior to crushing.

Based on the above, we do not believe that we can properly be considered a PRP at this site. We do not, therefore, plan to accept your offer to participate in the activities outlined in the scope of work enclosed with your letter.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. T. Noonan".

R. T. Noonan  
Senior Director  
Environmental Control

Amtrak



ORIGINAL  
(Red)

April 27, 1988

United States Environmental  
Protection Agency  
Region III  
84 Chestnut Building  
Philadelphia, Pa. 19107

Attn: Mr Lawrence Falkin

Re: Metro Container Corporation Site

Dear Mr. Lawrence:

This is in response to Mr. Bruce P. Smith's letter of April 12, 1988 to our Mr. Denney. As we discussed by telephone on April 20, 1988, that letter was forwarded to me for response. Thank you for extending the due date to May 2, 1988.

The following information is submitted in the format of Mr. Smith's request:

1. To the best of our knowledge Amtrak did not generate or transport or have transported any hazardous substances to this site.
2. Amtrak disposed of 230 empty, crushed drums at this site. The drums were transported to the site by Metro Container Enterprises.
3. The shipping documents in our possession do not indicate a shipping date. However, a purchase order was confirmed in a telephone award to Metro Enterprises on March 22, 1988. According to our on-site personnel, the crushed drums were loaded on a Metro Container truck and shipped on March 24, 1988.
4. We are not aware of any correspondence between Amtrak and any regulatory agency regarding these containers.
5. The only known correspondence between ourselves and Metro Container Corporation that we have in our possession are the contract document and shipping paper. We have no other correspondence with any other third party regarding the 230 drums.

ORIGINAL  
(Red)

6. Amtrak has no knowledge of any other persons who generated, treated, stored, transported, or disposed or who arranged for such handling of substances and/or containers to this site.

7. Amtrak has no real estate interests at this site.

8. The empty crushed drums were sent to this site for disposal.

Enclosed are copies of all documents in Amtrak's possession regarding the disposal of these drums. The efforts taken to identify these documents were done so through knowledge of the responsibilities of our in-house personnel. This included contacting our Purchasing, Material Control, Mechanical, Legal and Environmental Control departments.

Amtrak is self insured for the first \$25 million of liability.

Please contact me if you need additional information. I can be reached in Washington, D.C. at (202) 383-2583.

Very truly yours,



R. T. Noonan  
Sr. Director, Environmental  
Control & Industrial Hygiene

Enclosures:

cc: J.I. Roberts  
B.J. Tripoli  
D.J. Rewkowski

**NATIONAL RAILROAD PASSENGER CORP.**

Red

**C 2461**

ACCTG CODE

ITEM	I.C.C	SUB	RES/LOC CENTER	FUNCTION	WORK ORDER	ORI- DEF
		522	7311	1875		

SHIP TO: Metro Container  
2ND & PRICE ST.  
TRAINER, PA.

ATTENTION OF:

Shipped From: Amtrak NRPC  
Wilmington Maintenance Facility  
Foot of Carpenter Ave  
Wilmington, DE 19802

SHIPPING DATE

PURCHASE ORDER NO./SUPPL. NO.	
-------------------------------	--

482340-8

CONTRACT NO.

AME-APPRO-PROJECT

ACCOUNT NO.

NUMBER & KIND OF PACKAGES	WEIGHT AND MEASUREMENTS	MARKS AND NUMBERS	REMARKS
1000	1000	1000	1000

BILL OF LADING NO./PRO. NO.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
VALUE OF SHIPMENT																																																																																																			

**N/A**

SHIP VIA

PPD.

COLL.

REJECTION NC

INSPECTION REQUIREMENTS

APPLICABLE CONSIGNEE PURCHASE ORDER NO./DR. NO.

ITEM NO.	QUANTITY	UNIT	DESCRIPTION INCLUDE, O.E.M. NO., SERIAL NO. (AS APPLICABLE), AMTRAK PART NO.	PACKAGE NUMBER	NET WEIGHT	GROSS WEIGHT
1	230	EA	NON-HAZARDOUS 55 gallon drums (CRUSHED)			230

REASON FOR SHIPMENT

BUYER'S SIGNATURE AND DATE

MISCELLANEOUS SHIPMENTS (NOT AUTHORIZED BY A PURCHASE ORDER/SUPPL.) REQUIRES REASON FOR SHIPMENT AND AUTHORIZED APPROVAL.

### PACKAGES RECEIVED BY

SHIPPER'S SIGNATURE

**ORIGINATOR**

DEPT

**EXT.**

**APPROVAL**

NRPC-696 (4/75)

4/22/88

ORIGINAL  
(Red)

MR. R. NOONAN:

REFERENCE OUR SHIPMENT OF CRUSHED DRUMS THROUGH METRO CONTAINER, PLEASE BE ADVISED TO THE FOLLOWING:

3/17/88 - SPOKE TO MATT HUTCHINSON REGARDING 30 cu. ft. ROLL-OFF

3/21/88 - WAS INFORMED BY MATT HUTCHINSON THAT AL WESTFALL OF METRO CONTAINER WOULD BE CALLING ABOUT COMING IN TO CHECK OUR DRUM SITUATION; TO SEE IF THEY WOULD ACCEPT THEM. LATER THE SAME DAY, I WAS INFORMED BY MICHELLE THAT FRAN. MILLER OF METRO CONTAINER WAS COMING IN.

MET WITH FRAN MILLER AND AL WESTFALL AT 11:35<sup>AM</sup> AND WAS INFORMED THEY HAD VISITED THE CRUSHER AREA WITH F. WILLIAMS, AND WOULD CONTACT MATT HUTCHINSON ABOUT TAKING THE DRUMS. AL & FRAN SPECIFIED IN THE FUTURE (IF IF THEY GOT THE CONTRACT) THEY DID NOT WANT THE DRUMS CRUSHED; BUT MERELY DRAINED.

3/22/88 - WAS INFORMED BY MATT HUTCHINSON THAT METRO CONTAINER WOULD GET THE CONTRACT.

3/23/88 - WAS ADVISED BY AL WESTFALL OF METRO CONTAINER THEY WOULD PICK UP THE DRUMS ON 3/24/88.  
(P.O. # 482340-8)

ORIGINAL  
(Red)

3/24/88 - LOADED TRUCK FROM "METRO CONTAINER" WITH 230  
DRAINED, CRUSHED NON-PC.B. DRUMS.

DRUMS IN QUESTION WERE EMPTIED INTO LS#2 & LS#10  
HOLDING TANKS ON 3/10/88 & 3/11/88; WITH LS#2 TANK BEING  
FILLED ON 3/10/88 AND LS#10 TANK FILLED ON 3/11/88. AFTER  
DRUMS WERE WERE TURNED UP-SIDE DOWN, AND REMAINED  
IN THIS POSITION UNTIL CRUSHED.

SOME OF THESE DRUMS WERE PARTIALLY FULL, BECAUSE  
"PETROCON" HAD DRAWN SOME OF THE OILS FROM THE DRUMS  
FOR RECYCLING. TO THE BEST OF MY KNOWLEDGE THESE  
DRUMS CONTAINED NON-HAZARDOUS, NON-PC.B WASTE OIL.

RESPECTFULLY,

*J. J. Clark*

AL. WETTABLE



**Metro Container Corp.**  
**Metro-Enterprise Container Corp.**

Second & Price Streets  
Trainer, PA 19013

Francis Miller

(215) 485-6100